

**IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	
<b>-against-</b>	:	<b>CRIMINAL ACTION</b>
<b>YAKOV BABCHINETSKIY, et al.,</b>	:	<b>No. 07-17 (S-1)(LDD)</b>
<b>Defendants.</b>	:	

**UNOPPOSED PETITION TO MODIFY BAIL CONDITIONS**

Defendant Yakov Babchinetskiy, through his attorneys, hereby requests a modification of his bail conditions which would permit him to travel to New York City for counsel visits. In support of this petition, Defendant Babchinetskiy states as follows:

1. On October 2, 2009, Mr. Babchinetskiy was released on bail by Judge Sitarski with the conditions that he be subject to 24-hour electronic monitoring and permitted to leave his home only for medical appointments, religious services, attorney visits within the Eastern District of Pennsylvania, and court appearances.
2. Since that time, Mr. Babchinetskiy has remained on bail without incident.
3. Because Mr. Babchinetskiy is prohibited from traveling to New York City, where lead counsel's office is located, frequent attorney meetings have been curtailed due to the significant travel time required.
4. Recognizing this hindrance, Mr. Babchinetskiy's pretrial services officer and the government, by Senior Litigation Counsel Linda Marks, have consented to his traveling to New York City for attorney visits, on the condition that pretrial services will be notified of Mr. Babchinetskiy's arrival and departure from counsel's office and of his arrival back home.

5. All other conditions of Mr. Babchinetskiy's release, as previously set by the Court, will remain in effect.

WHEREFORE, defendant Babchinetskiy respectfully requests that this Court grant his Motion.

Dated: New York, New York  
January 5, 2010

Respectfully submitted,

**LAW OFFICES OF JEFFREY LICHTMAN**

By: 

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*Attorneys for Yakov Babchinetskiy.*

So Ordered:

Hon. Legrome D. Davis, U.S.D.J.